

DJS:sr

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA)	CASE NO. <u>00-6037-Cr-ZLOCH</u>
)	Magistrate Judge
v.)	
)	
SAUL JACKSON)	
)	
Defendants)	
_____)	

**GOVERNMENT'S RESPONSE TO
THE STANDING DISCOVERY ORDER**

The United States hereby files this response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16, and is numbered to correspond with Local Rule 88.10.

- A. 1. The government is unaware of any written or recorded statements made by the defendant, except those attached to this response and incorporated herein by response.
2. The following is the substance of an oral statement made by the defendant before or after arrest by a person then known to the defendant to be a government agent, which the government intends to use at trial.
- Defendant indicated that he was going to use the entry stamp device for an advertisement for his "furniture business."
3. The defendant did not testify before the Grand Jury.
4. The NCIC record of the defendant, if any exists, will be made available upon receipt by this office.

[Signature]
14

5. Books, papers, documents, photographs, tangible objects, buildings or places which the government intends to use as evidence at trial to prove its case in chief, or were obtained or belonging to the defendant may be inspected at a mutually convenient time at the Office of the United States Attorney, 500 E. Broward Blvd., Suite 700, Ft. Lauderdale, Fl 33394. Please call the undersigned to set up a date and time that is convenient to both parties. The undersigned will tentatively set the date for Friday, March 3, 2000 at 11:00 a.m.. Please call the undersigned with 48 hours notice if you intend to review the evidence at this date and time.

The attachments to this discovery response are not necessarily copies of all the books, papers, documents, etc., that the government may intend to introduce at trial.

6. There were no physical or mental examinations or scientific tests or experiments made in connection with this case, except as attached to this response.
-
- B. DEMAND FOR RECIPROCAL DISCOVERY: The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.
 - C. The government will disclose any information or material which may be favorable on the issues of guilt or punishment within the scope of Brady v. Maryland, 373 U.S. 83 (1963), and United States v. Agurs, 427 U.S. 97 (1976).
 - D. The government will disclose any payments, promises of immunity, leniency, preferential treatment, or other inducements made to prospective government witnesses, within the scope of Giglio v. United States, 405 U.S. 150 (1972), or Napue v. Illinois, 360 U.S. 264 (1959).
 - E. The government will disclose any prior convictions of any alleged co-conspirator, accomplice or informant who will testify for the government at trial.

- F. The government is not aware of any photo, line-up, show up or similar identification procedure.
- G. The government has advised its agents and officers involved in this case to preserve all rough notes.
- H. The government will timely advise the defendant of its intent, if any, to introduce during its case in chief proof of evidence pursuant to F.R.E. 404(b). You are hereby on notice that all evidence made available to you for inspection, as well as all statements disclosed herein or in any future discovery letter, may be offered in the trial of this cause, under F.R.E. 404(b) or otherwise (including the inextricably-intertwined doctrine).
- In addition, the government may introduce under Rule 404(b) evidence underlying the defendant's past criminal activity that has resulted in arrests and/or convictions and which is summarized in the attached court documents or others which may be provided at a later date.
- I. N/A
- J. The government has ordered transcribed the Grand Jury testimony of all witnesses who will testify for the government at the trial of this cause.
- K. No contraband is involved in this indictment, except the seized stamp device which may be viewed at a mutually convenient time at the U.S. Attorney's Office, Ft. Lauderdale, Florida.
- L. The government does not know of any automobile, vessel, or aircraft allegedly used in the commission of this offense that is in the government's possession.
- M. The government is not aware of any latent fingerprints or palm prints which have been identified by a government expert as those of the defendant.
- N. N/A
- O. N/A
- P. N/A

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

In addition to the request made above by the government pursuant to both Section B of the Standing Discovery Order and Rule 16(b) of the Federal Rules of Criminal Procedure, in accordance with Rule 12.1 of the Federal Rules of Criminal Procedure, the government hereby demands Notice of Alibi defense; the approximate time, date, and place of the offense was:

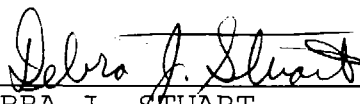
Time: At approximately 4:45 p.m.
Date: January 31, 1999
Place: In and near Andrews Avenue/Progresso Dr.,
Ft. Lauderdale, Florida

The attachments to this response are numbered pages 1 - 12. Please contact the undersigned Assistant United States Attorney if any pages are missing.

Respectfully submitted,

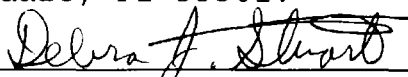
THOMAS E. SCOTT
UNITED STATES ATTORNEY

By:


DEBRA J. STUART
Assistant United States Attorney
Court No. 5500061
500 E. Broward Blvd., 7th Flr
Ft. Lauderdale, Fl 33394
Tel: (954) 356-7255
Fax: (954) 356-7336

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was hand delivered 23rd day of February, 2000 to: Patrick Hunt, AFD, 101 N.E. 3rd Avenue, Ft. Lauderdale, Fl 33301.


DEBRA J. STUART
Assistant United States Attorney

CUSTOM STAMP ORDER FORM


ORDER DATE	EDA	SKU #	PAGE	CONTROL NUMBER
1-20	5-7	4478	L of 1	4870293-70

S T O R E	OFFICE DEPOT #220	10800220
	1590 NORTH FEDERAL HWY	
	FORT LAUDERDALE	FL 33304
	954-563-0646	

blvdr@webtv.net

<p>5. INK COLOR * :</p> <p><input checked="" type="radio"/> Black <input type="radio"/> Red <input type="radio"/> Blue <input type="radio"/> Green <input type="radio"/> Violet <input type="radio"/> Blue / Red (Colors Only)</p> <p>* If no color is selected, black ink will be given</p> <p>6. If the text will not fit, do you want us to reduce the letter size to fit selected size or go to the next larger stamp at an extra cost?</p> <p><input type="radio"/> Reduce Text Size <input type="radio"/> Larger Stamp</p>	<p>IMPORTANT:</p> <ul style="list-style-type: none"> For logos or graphic art-work, mail in camera-ready image with at least 300 dpi resolution Signatures must be signed with black felt-tip pen on white, unlined paper and must be mailed in. <p>Is this a REDO? <input type="radio"/> YES</p> <p>Fax this <u>original</u> PO with YES shaded, and give REASON in Special Instructions Area.</p>
--	--

Logo? <input type="radio"/> YES	Border Around Text? <input type="radio"/> YES	Internal Use Only: TYPESET <input type="radio"/>
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		<p>BRADLEY SPECIALTIES, INC.</p> <p>831 N.E. 2nd Avenue</p> <p>Ft. Lauderdale, FL 33304</p>	
<p>REPUBLICA DE VENEZUELA</p> <p>CONSULADO EN PARIS</p>		<p>R E P U B L I C A D E</p> <p>V E N E Z U E L A</p> <p>C O N S U L A D O E N</p> <p>P A R I S</p>	

and state "See Page 2" in Special Instructions. Write this form's Control Number and Store ID at the top of Page 2.

ACCESSORY	RETAIL PRICE \$
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10564

**Office
DEPOT**

ORDER DATE

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OF

4870286

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CITY, STATE, ZIP
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OFFICE DEPOT #220

10800220

1590 NORTH FEDERAL HWY

FORT LAUDERDALE

FL 33304

954-563-0646

1 ITEM / MODEL #

5. INK COLOR*

☒ Black ☐ Red ☐ Blue ☐ Green ☐ Violet ☐ Blue / Red
(Dates Only)
* If no color is selected, black ink will be given

2. QUANTITY

3. NUMBER OF LINES

6. If the text will not fit, do you want us to
reduce the letter size to fit selected size or go
to the next larger stamp at an extra cost?

4. STYLE #

☐ Centered
☐ Flush Left☐ Reduce Text Size ☐ Larger Stamp**IMPORTANT:**

- For logos or graphic art-work, mail in camera-ready image with at least 300 dpi resolution.
- Signatures must be signed with black felt-tip pen on white, unlined paper and must be mailed in.

Is this a REDO? ☐ YESFax this original PO with YES shaded,
and give REASON in Special Instructions
Area

7. TEXT/COPY AREA*

* If ordering date(s) or number(s), indicate where text should be
placed in relation to dates or numbersLogo? ☐ YESBorder Around Text? ☐ YESInternal Use Only: TYPESET ☐

For additional lines of text, use a 2nd page and state "See Page 2" in Special Instructions. Write this form's Control Number and Store ID at the top of Page 2

8. STAMP ACCESSORY

ITEM #

ACCESSORY QUANTITY

RETAIL
PRICE \$

\$

\$

TOTAL \$

☐ SPECIAL INSTRUCTIONS☐ MATCH EXAMPLE?** If this is not selected, item# & style# shown
above will be used* Once orders are received, they are not subject
to change or cancellation.

ORDERED BY DATE RECEIVED BY DATE & HOW NOTIFIED

CUSTOMER VERIFICATION

PLEASE SIGN UPON RECEIPT OF ORDER

CUSTOMER
SIGNATURESee
attached
for
SIZE
BRADLEY SPECIALTIES, INC.
831 N.E. 2nd Avenue
Ft. Lauderdale FL 33304

PRODUCTION COPY

0002

4054 8100 0053 8818

DO NOT CIRCLE EXPIRATION DATE 10/01/01

USE BOX BELOW

SAUL JACKSON

BRADLEY SPECIALTIES INC
FT LAUDERDALE FL

223 20 4464 992

PURCHASER SIGN HERE

Cardholder acknowledges receipt of goods and/or services in the amount of the total shown herein and agrees to perform the obligations set forth in the Cardholder's agreement with the issuer.

EXPIRATION DATE ☒ DATE CHECKED

PRESS FIRMLY — USE BALL POINT PEN

QUAN.	CLASS	DESCRIPTION	PRICE	AMOUNT
1		cur stamp		21 50
1		cur 10 stamp		20 60
1		#0 red PAD		3 10
1		#2 BLUE PAD		5 75
DATE 1-24-00 AUTHORIZATION 078769			SUB TOTAL	50 95
REFERENCE NO.			TAX	4 11
FOLIO/CHECK NO.			SERVER	3 06
			CLEER	
			TIPS	
			MISC.	
SALES SLIP			TOTAL	54 01

#005

54.01

MERCHANT COPY

0004



MARKING DEVICE ORDER FORM

e-mail brdlyspec@aol.com

BRADLEY SPECIALTIES, INC.

831 N.E. 2nd Ave., Ft. Lauderdale, FL 33304

954-763-4859 TOLL FREE 800 824-2514

FAX (954) 763-1348 OR 800-851-9416

Date _____

Purchase Order # _____

CUSTOMER PICK-UP

Customer Sara Tamm

Dept. # _____

Ship To 712 SW 2nd CtFt. Lauderdale 33310Phone 523 8865Attn: Seal

QUANTITY

- ☐ Center ☐ Flush Left
☐ Flush Right ☐ Justify

NOTE: Copy will be CENTERED unless specified otherwise.

BORDER

- ☐ Rectangle ☐ Circle ☐ Oval

☐ STAMP PADColor RED

trodat printy

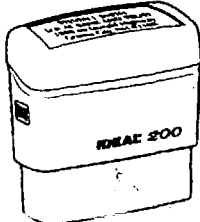


- ☐ Printy 4910
☐ Printy 4911
☐ Printy 4912
☐ Printy 4913
☐ Printy 4915

☐ Other Size _____

Ink Color _____

IDEAL2



- ☐ Ideal 50
☐ Ideal 100
☐ Ideal 200
☐ Ideal 300

Ink Color _____

- ☐ StampEver
Pre-inked Stamp

Mount
Size _____

Color Ink _____



- ☐ Handle
Stamp



Maximum Dimensions

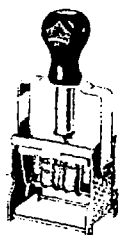
Long _____ High _____

TYPE WILL BE SIZED TO FIT THIS AREA
UNLESS INDICATED BELOW

DIE PLATE DATERS:

USED WITH A STAMP PAD, WITH
YOUR COPY AND THE DATE.IF A SPECIFIC BRAND OR MODEL
IS KNOWN PLEASE LET US KNOW.
OTHERWISE WE WILL USE THE
BEST ONE FOR YOUR NEEDS.☐ _____

SELF-INKING DATERS:

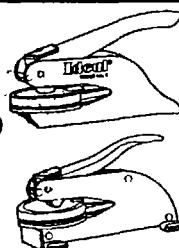
YOUR INFORMATION WITH A DATE
AND THE EASE OF PAD FREE STAMPING.IF A SPECIFIC BRAND OR MODEL IS KNOWN
PLEASE LET US KNOW, OTHERWISE WE WILL
USE THE BEST ONE FOR YOUR NEEDS.☐ _____

SEALS:

- ☐ Corporate
☐ Notary
☐ Architect
☐ Engineer
☐ Custom

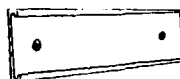
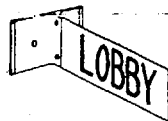
HAND

DESK



ENGRAVED SIGNS:

- ☐ Desk ☐ Wood Block
☐ Wall ☐ Hallway
☐ Panels ☐ Name Badges



RICHARD SWEET

Please Note: Engraved Typestyles are limited

Plastic Color _____ Size of Plate _____

Line	Type Style	Stamp • Seal • Engraved Signage	Copy
1		U.S. IMMIGRATION	
2		CGC MIA-1AP 1255	
3		DATE	
4		ADMITTED	
5		UNTIL	
6			
7			
8			
9			
10			

U.S. IMMIGRATION
860 MIA-1AP 1255

JAN 29 1996

U.S. IMMIGRATION
860 MIA-1AP 1255

JAN 29 2000

change
multiturn

PLEASE NOTE: ALL COPY WILL BE CENTERED ON ALL ORDERS UNLESS OTHERWISE SPECIFIED ABOVE.

SPECIAL INSTRUCTIONS OR SAMPLE:

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SPECIALTIES INC.

1 N.E. 2nd AVENUE
 UDERDALE, FL. 33304
 ONE (954) 763-4859

INVOICE NO.

22524

DATE

1-25-2000

YOUR P.O. NO.

J S D PRINTER

SHIP TO
SAUL JACKSON

REFERENCE #

SHIP VIA

DESCRIPTION	UNIT PRICE	EXTENDED PRICE
TAMPS	21.50	21.
ER STAMP	20.60	20.
PAD	3.10	3.
PAD	5.75	5.
S1	SUB TOTAL	50.95 ⁰⁰
	SALES TAX	3.06
	TOTAL DUE	54.01 ⁰⁰

ID-MC/VISA

PLEASE PROOFREAD ALL STAMPS
 IMMEDIATELY. ANY CLAIMS TO
 FEB 7 2000
 54.01


4054 8100 0053 8818

5811557

10/01 V
SAUL JACKSONADLEY SPECIALTIES INC
T LAUDERHALL FL

23 20 4464 992

PURCHASER SIGN HERE

X 

Cardholder acknowledges receipt of goods and/or services in the amount of the Total shown hereon and agrees to perform the obligations set forth in the Cardholder's agreement with the issuer.

QUAN.	CLASS	DESCRIPTION	PRICE	AMOUNT
1		Notes w/copy		26.85
1		PAD		
DATE 1-31-02 AUTHORIZATION 030799			SUB TOTAL	26.85
REFERENCE NO.			TAX	1.61
FOLIO/CHECK NO.			TIPS	
			MISC.	
SALES SLIP				TOTAL 28.46

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BANK COPY

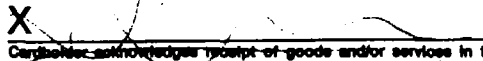
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			MISC.	
SALES SLIP				TOTAL 28.46

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IMPORTANT: RETAIN THIS COPY FOR YOUR RECORDS

CUSTOMER COPY

BRADLEY SPECIALTIES, INC.
 831 N.E. 2nd Avenue
 Fort Lauderdale, FL 33304
 (954)763-4859 Fax (954) 763-1348
 1-800-624-2514 Fax 800-851-9416

46321

Customer's
 Order No. _____ DATE 1-26-2000

SOLD TO Saul Jackson

ADDRESS _____

SALESMAN 523-8865 TERMS _____

CASH	CHARGE	C. O. D.	PAID OUT	RETD. MOSE.	RECD. ON ACCT.
QUAN	DESCRIPTION			PRICE	AMOUNT
1	Dater w/ copy				26.85
1	PAD				3.70
					29.95
					1.80
					31.75
	U.S. IMMIGRATION				161
	060 MIA-IAP 1255				
	JAN 29 2000				28.46
	ADMITTED _____ UNTIL _____				
	P A I D BRADLEY JAN 31 2000 P A I D				

ALL Claims and Returned Goods MUST Be Accompanied By This Bill

SIGNATURE _____

U.S. IMMIGRATION
060 MIA-IAP 1255

JAN 29 2000

ADMITTED _____
UNTIL _____

Inventory of vehicle

1/31/00
15 PM

- 1 pr tennis shoes
- 2 camera film + trap
metal beading
Xtra laundry detergent
windshield washer solvent
Minoltz flash meter(?)
Rope
Wax
Engine fluids
paintbrush
umbrella
- 2 Atlas
cloth
owner's manual
scarf
- 3 polishing rags
registration
Febreze
- 2 moisture lotion
sunblock
various maps
flashlight
virus caplets
cooler
various audio tapes
sunglasses
off insect spray

Shelley
SA Rick Bendel

Ron
SA Ron Crawford



RENOVACION No _____
CONSULADO DE VENEZUELA
REVOVADO HASTA EL _____

EL CONSUL JORGE PEREZ